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*Attorneys for Plaintiff,
Atlantic Specialty Insurance Company*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

ATLANTIC SPECIALTY INSURANCE)
COMPANY,)

Plaintiff,)

v.)

FIRSTCHOICE MEDICAL GROUP, INC.,)
DR. MANTHANI REDDY, DR. KIRAN)
REDDY, DR. CHINNAPA NAREDDY,)
DR. JOSE-LUIS BAUTISTA, DR. PAM)
JANDA, DR. TARLOCHAN TAGORE,)
DR. MADHAVA NARALA, DR.)
AJIT KHAIRA and SMARTMED, INC.)
d/b/a MEDSMART CONSULTING)

Defendants.)

Case No. 1:19-cv-01794-DAD-BAM

STIPULATED EXTENSION OF DEADLINE
FOR PRE-TRIAL MOTIONS;
ORDER

STIPULATION

Plaintiff, Atlantic Specialty Insurance Company (“Atlantic”), and Defendants,
FIRSTCHOICE MEDICAL GROUP, INC., DR. MANTHANI REDDY, DR. KIRAN REDDY,

1 DR. CHINNAPA NAREDDY, DR. JOSE-LUIS BAUTISTA, DR. PAM JANDA, DR.
2 TARLOCHAN TAGORE, DR. MADHAVA NARALA and DR. AJIT KHAIRA (collectively,
3 “FIRSTCHOICE”), and SMARTMED, INC., doing business as MedSmart Consulting
4 (“SmartMed”) (collectively, “Defendants”), hereby agree and stipulate as follows:

5 WHEREAS, Counsel for Atlantic has experienced multiple changes in staffing, including
6 the April 16, 2021 departure of the main handling attorney, Alan Posner;

7 WHEREAS, Atlantic would benefit from a brief 30-day extension for its new handling
8 attorney(s) to adequately review and revise Atlantic’s Motion for Summary Judgment;

9 WHEREAS, Defendants do not object to the requested extension, and;

10 WHEREAS: This extension is not being sought for any improper purpose or delay, and
11 will not otherwise alter the Scheduling Order currently in place for this matter;

12 WHEREAS: Counsel for Atlantic has obtained approval of all parties hereto
13 Atlantic has timely requested a thirty-day extension of all pertinent deadlines to file its Motion
14 for Summary Judgment, and that Defendants.

15 ACCORDINGLY, Atlantic and Defendants, by and through their respective counsel,
16 hereby agree and stipulate that the deadline for dispositive and non-dispositive pre-trial motions
17 is hereby extended from its current date of April 26, 2021 to May 26, 2021. In addition, Atlantic
18 hereby represents that it will not seek any further extensions for its Motion for Summary
19 Judgment.

20 Dated: April 23, 2021

HOPPE LAW GROUP

21
22 By: /s/ Theodore W. Hoppe

Theodore W. Hoppe
Attorneys for Plaintiff

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24 **ATLANTIC SPECIALTY INSURANCE**
25 **COMPANY**
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1 Dated: April 23, 2021

KARBAL, COHEN, ECONOMOU, SILK & DUNNE, LLC

2
3 By: /s/ Rory T. Dunne
Rory T. Dunne (PHV)
4 Attorneys for Plaintiff

5 **ATLANTIC SPECIALTY INSURANCE**
6 **COMPANY**

7 Dated: April 23, 2021

HAHN LOESER & PARKS LLP

8
9 By: /s/ James E. Heffner
James E. Heffner
10 Lindsay J. Mertens

11 Attorneys for Defendant
SMARTMED, INC.

12 Dated: April 23, 2021

WILKINS, DROLSHAGEN & CZESHINSKI, LLP

13
14 By: /s/ James H. Wilkins
James H. Wilkins
15 Attorneys for Defendants

16 **FIRSTCHOICE MEDICAL GROUP, INC.,**
17 **DR. MANTHANI REDDY, DR. KIRAN**
18 **REDDY, DR. CHINNAPA NAREDDY,**
19 **DR. JOSE-LUIS BAUTISTA, DR. PAM**
20 **JANDA, DR. TARLOCHAN TAGORE,**
21 **DR. MADHAVA NARALA, DR. AJIT**
22 **KHAIRA**

ORDER

GOOD CAUSE HAVING BEEN SHOWN, and based on the parties' stipulation, the Court hereby modifies its Scheduling Order (Doc. 34) and orders that the dispositive motion deadline only shall be extended to **May 26, 2021**. The deadline for non-dispositive motions remains unmodified, as all discovery deadlines have either passed or remain unchanged.

Additionally, the party's existing Pretrial Conference date is no longer compatible with the modified Dispositive Motions deadline. Accordingly, the Scheduling Order (Doc. 34) is further MODIFIED and the Pretrial Conference currently set for July 12, 2021 is continued to **Monday, September 13, 2021 at 1:30 PM in Courtroom 5 (DAD) before District Judge Dale A. Drozd.**

IT IS SO ORDERED.

Dated: **April 27, 2021**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2021 a copy of the foregoing document(s) were electronically filed using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Theodore W. Hoppe
Theodore W. Hoppe